

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: LIQUID ALUMINUM  
SULFATE ANTITRUST  
LITIGATION**

**Civil Action No. 16-md-2687  
(JLL) (JAD) (MDL No. 2687)**

District Judge Jose L. Linares  
Magistrate Judge Joseph A. Dickson

---

*This Document Relates to: Putative Class  
of Indirect Purchaser Plaintiffs*

---

***Document Filed Electronically***

**DEFENDANT C&S CHEMICALS, INC.’S  
ANSWER AND AFFIRMATIVE DEFENSES TO  
INDIRECT PURCHASER PLAINTIFFS’  
CONSOLIDATED CLASS ACTION COMPLAINT**

COMES NOW, Defendant C&S Chemicals, Inc. (“C&S”), and hereby  
answers and asserts its Affirmative Defenses to the Indirect Purchaser Plaintiffs’  
Consolidated Class Action Complaint (“Complaint”), as follows:

**AFFIRMATIVE DEFENSES**

**FIRST DEFENSE**

Some or all of Plaintiffs’ claims and/or damages are barred by the statute of  
limitations.

**SECOND DEFENSE**

An award of damages against C&S, plus fines and penalties, may be so large  
and disproportional to any alleged conduct of C&S as to violate the Fifth, Eighth

and/or Fourteenth Amendment of the United States Constitution, and/or the constitution(s) of the state(s) under whose law such damages, fines and/or penalties are awarded.

### THIRD DEFENSE

Some or all of the alleged conduct of C&S was the result of economic justification and/or coercion.

### FOURTH DEFENSE

Some or all of the relief sought by Plaintiffs from C&S is barred by the doctrines of waiver, estoppel and/or laches.

### FIFTH DEFENSE

To the extent any relief sought by Plaintiffs is equitable in nature, such relief may be barred by the doctrine of unclean hands.

### SIXTH DEFENSE

Some or all of the relief sought by Plaintiffs may be barred, in whole or in part, by comparative fault and/or apportionment of damages.

### SEVENTH DEFENSE

Some or all of the claims of Plaintiffs may be barred by lack of standing.

## **ANSWER**

C&S answers the numbered paragraphs of the Complaint as follows:

1.

C&S denies the allegations of paragraph 5 of the Complaint which pertain to C&S. C&S admits that, during the period 1997 to present, it has sold liquid aluminum sulfate (“Alum”) in the United States. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 1 of the Complaint.

2.

C&S admits that Alum can be used, among other things, to treat drinking and waste water; to alter the pH of soil; to clarify and to control algae growth in lakes, ponds and other water features; to fix dyes to textiles; as a litter amendment for ammonia control in poultry houses; and in the manufacturing of pulp and paper. C&S denies any remaining allegations of paragraph 2 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 2 of the Complaint.

3.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 3 of the Complaint.

4.

C&S admits that Alum can be sold by the ton, that an Alum purchaser may re-sell in smaller volumes to others, and that Alum may be drop shipped to a purchaser. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 4 of the Complaint.

5.

C&S denies the allegations of paragraph 5 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 5 of the Complaint.

6.

C&S denies the allegations of paragraph 6 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 6 of the Complaint.

7.

C&S denies the allegations of paragraph 7 of the Complaint which pertain to C&S. C&S admits that certain other Defendants and/or executives or employees thereof have been indicted and/or pled guilty. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 7 of the Complaint.

8.

C&S denies the allegations of paragraph 8 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 8 of the Complaint.

9.

C&S denies the allegations of paragraph 9 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 9 of the Complaint.

10.

C&S denies any allegation of paragraph 10 that pertains to C&S. C&S admits that certain Defendants other than C&S have pled guilty and/or been indicted. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 10 of the Complaint.

11.

C&S denies the allegations of Paragraph 11 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 11 of the Complaint.

12.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 12 of the Complaint.

13.

C&S denies that it resides, transacts business or is found within the District of New Jersey. C&S lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations of paragraph 13 of the Complaint.

14.

C&S admits that it has transacted business in the United States, and that it has sold Alum in certain states. C&S denies the remaining allegations of paragraph 14 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 14 of the Complaint.

15.

C&S denies the allegations of paragraph 15 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 15 of the Complaint.

16.

C&S denies the allegations of paragraph 16 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 16 of the Complaint.

17.

C&S denies the allegations of paragraph 17 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 17 of the Complaint.

18.

C&S denies the allegations of paragraph 18 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 18 of the Complaint.

19.

C&S denies the allegations of paragraph 19 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 19 of the Complaint.

20.

C&S denies the allegations of paragraph 20 of the Complaint which pertain

to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 20 of the Complaint.

21.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 21 of the Complaint, except C&S admits that General Chemical has manufactured and sold Alum.

22.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 22 of the Complaint.

23.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 23 of the Complaint.

24.

C&S denies any allegation of paragraph 24, and any sub-part thereof, which pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 24 of the Complaint, or any sub-paragraph thereof.



25.

C&S denies any allegation of paragraph 25 which pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 25 of the Complaint.

26.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 26 of the Complaint.

27.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 27 of the Complaint.

28.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 28 of the Complaint.

29.

C&S admits the first sentence of paragraph 29 of the Complaint. As to the second and third sentences of paragraph 29, C&S admits that it produces Alum, sodium aluminate and other chemicals/materials, that it operates manufacturing facilities in Florida, Georgia, South Carolina and Minnesota, and that during the

period 1997 to present, C&S has sold Alum in certain states. C&S denies the remaining allegations of paragraph 29.

30.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 30 of the Complaint, except C&S admits that GEO has sold Alum in the United States.

31.

C&S denies any allegation of paragraph 31 which pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 31 of the Complaint.

32.

C&S denies any allegation of paragraph 32 which pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 32 of the Complaint.

33.

C&S denies any allegation of paragraph 33 which pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 33 of the Complaint.

34.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 34 of the Complaint, except C&S admits that USALCO manufactures Alum and has a plant in or near Baltimore.

35.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 35 of the Complaint.

36.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 36 of the Complaint.

37.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 37 of the Complaint.

38.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 38 of the Complaint.

39.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 39 of the Complaint.

40.

C&S denies the allegations of paragraph 40 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 40 of the Complaint, except C&S admits that at certain times Reichl held some position at General Chemical.

41.

C&S denies the allegations of paragraph 41 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 41 of the Complaint, except C&S admits that at certain times, Steppig held some position at GEO.

42.

C&S denies the allegations of paragraph 42 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 42 of the Complaint.

43.

C&S denies the allegations of paragraph 43 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 43 of the Complaint, except C&S admits that at

certain times, Avraamides held some position at General Chemical and some position at GEO.

44.

C&S denies the allegations of paragraph 44 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 44 of the Complaint, except C&S admits that at certain times Gupta held some position at General Chemical.

45.

C&S denies the allegations of paragraph 45 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 45 of the Complaint.

46.

C&S denies the allegations of paragraph 46 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 46 of the Complaint.

47.

C&S denies the allegations of paragraph 47 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 47 of the Complaint.

48.

C&S denies the allegations of paragraph 48 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 48 of the Complaint.

49.

C&S denies the allegations of paragraph 49 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 49 of the Complaint.

50.

C&S admits that uses of Alum include as a water treatment chemical to remove impurities from water and in the paper industry; that Alum is the salt of sulfuric acid and aluminum hydroxide whose chemical formula is  $Al_2(SO_4)_3$ ; that Alum attracts and reacts with negative particles; and that in certain uses Alum precipitates negative particles out of water as ionic solids. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 50 of the Complaint.

51.

C&S admits that in certain uses, Alum aggregates small particles into larger particles that can fall to the bottom of a holding container or natural structure.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 51 of the Complaint.

52.

C&S admits that uses of Alum include those alleged in paragraph 52 of the Complaint. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 52 of the Complaint.

53.

C&S admits that certain municipalities use Alum for certain purposes. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 53 of the Complaint.

54.

C&S admits that certain municipalities use Alum for certain purposes, and that Alum can help a user meet government environmental standards. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 54 of the Complaint.

55.

C&S admits that certain water treatment service providers use Alum for certain purposes. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 55 of the Complaint.

56.

C&S denies that it was involved in any “collusion” as alleged. C&S admits that the price at which it sold Alum to some customers at certain times may have increased while certain costs associated with the production of Alum increased, remained steady or declined. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 56 of the Complaint.

57.

C&S admits the allegations in the first and third sentences that competition for the sale of Alum sometimes is based in part on price. C&S denies the allegations of the second sentence of paragraph 57 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 57 of the Complaint.

58.

C&S denies that Alum is “relatively easy to manufacture.” C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 58 of the Complaint.

59.

C&S admits that certain municipalities sometimes employ a bidding process for the procurement of Alum. C&S lacks knowledge or information sufficient to



form a belief as to the truth of the remaining allegations of paragraph 59 of the Complaint.

60.

C&S admits that it sometimes learns of a municipality's need and requirements for Alum through some form of public notice of invitation to bid disseminated by or on behalf of the municipality. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 60 of the Complaint.

61.

C&S admits that certain invitations or requests to bid for the supply of Alum sometimes specify a date and/or time deadline to submit a sealed bid, that the municipality issuing the invitation sometimes publicly opens and reads aloud each bid it received, and that sometimes the municipality issuing the invitation will encourage certain persons and/or entities to attend such public opening and reading. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 61 of the Complaint.

62.

C&S admits that it is not privy to the content of bids of other bidders for contracts to provide Alum to municipalities. C&S lacks knowledge or information

sufficient to form a belief as to the truth of the remaining allegations of paragraph 62 of the Complaint.

63.

C&S admits that certain municipalities sometimes require bidders to execute and submit an affidavit with their bid which certifies that the bidder has not divulged or discussed its bid with any other bidders, or compared its bid with the bids of any other bidders. C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 63 of the Complaint.

64.

C&S admits that sales can increase if population grows or existing products are replaced, and that additional market share sometimes can be captured through price competition. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 64 of the Complaint.

65.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 65 of the Complaint.

66.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 66 of the Complaint, except C&S admits that population growth can affect Alum sales.

67.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 67 of the Complaint.

68.

C&S denies any involvement in any conspiracy as alleged, and denies that its “input costs” either declined or held steady throughout the period 1997 to present. C&S admits that during the period 1997 to present, the cost of bauxite ore sometimes increased and sometimes decreased. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 68 of the Complaint.

69.

C&S admits that sulfuric acid is a component used in Alum, that at times from early 2009 through 2010 the cost of sulfuric acid declined, and that at times during 2008, the cost of sulfuric acid increased. The remaining allegations of paragraph 69 of the Complaint are denied.

70.

C&S admits that at times during the period 1997 through the present, the price at which it sold Alum to certain customers sometimes increased. C&S denies any other allegations of paragraph 70 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 70 of the Complaint.

71.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 71 of the Complaint, except that C&S admits that at certain times increases in the cost of raw materials have caused increases in the price at which C&S sells Alum.

72.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 72 of the Complaint.

73.

The allegations of paragraph 73 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 73 of the Complaint.

74.

C&S denies that it engaged in any anti-competitive conduct as alleged. C&S admits that any competitor in the Alum market will incur production, manufacturing and transportation costs; encounter various regulatory requirements; must possess certain specialized technical knowledge; and must have access to a certain amount of capital and to distribution channels. C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 74 of the Complaint.

75.

C&S admits that Alum sometimes is transported to a customer by rail or truck from the manufacturing plant closest to the customer; that the cost of freight sometimes is considered in the price which is charged a customer for Alum; and that the cost of freight can be one factor in determining whether a supplier can make a profit on an Alum sale. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 75 of the Complaint.

76.

C&S admits that in or about 2010, Affinity Chemical LLC entered the Alum market, that Frank Reichl was one of the principals of Affinity Chemical LLC, and that Frank Reichl has pled guilty. C&S lacks knowledge or information sufficient

to form a belief as to the truth of the remaining allegations of paragraph 76 of the Complaint.

77.

C&S admits that certain Defendants sell Alum in the United States, and that at times during the period 1997 to present, C&S has distributed, supplied, or purchased Alum from another Alum manufacturer. C&S denies that it engaged in any collusion as alleged. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 77 of the Complaint.

78.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 78 of the Complaint, except C&S denies any involvement in any anti-competitive activity or conspiracy as alleged.

79.

C&S admits that one or more persons or entities has pled guilty, and that one or more additional persons or entities has been indicted. C&S denies any involvement in any conspiracy, as alleged. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 79 of the Complaint.

80.

C&S denies any allegation of paragraph 80 that pertains to C&S. C&S admits that that Frank Reichl was, at certain time(s), an executive of General Chemical or some related corporate entity, and that he has pled guilty. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 80 of the Complaint.

81.

C&S denies any allegation of paragraph 81 that pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 81 of the Complaint.

82.

C&S denies any allegation of paragraph 82 that pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 82 of the Complaint.

83.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 83 of the Complaint.

84.

C&S denies any involvement in any conspiracy as alleged. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 84 of the Complaint.

85.

C&S denies any involvement in any conspiracy as alleged. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 81 of the Complaint.

86.

C&S denies any allegation of paragraph 86 that pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 86 of the Complaint.

87.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 87 of the Complaint.



88.

C&S denies any allegation of paragraph 88 that pertains to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 88 of the Complaint.

89.

The allegations of paragraph 89 of the Complaint, and each sub-paragraph thereof, which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 89 of the Complaint.

90.

The allegations of paragraph 90 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 90 of the Complaint.

91.

Any allegation of paragraph 91 that pertains to C&S is denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 91 of the Complaint.

92.

The allegations of paragraph 92 of the Complaint, and each sub-paragraph thereof, which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 92 of the Complaint.

93.

The allegations of paragraph 93 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 93 of the Complaint.

94.

Any allegations of paragraph 94 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 94 of the Complaint.

95.

Any allegations of paragraph 95 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 95 of the Complaint.

96.

Any allegations of paragraph 96 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 96 of the Complaint.

97.

The allegations of paragraph 97 of the Complaint, and each sub-paragraph thereof, which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 97 of the Complaint.

98.

The allegations of paragraph 98 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 98 of the Complaint.

99.

Any allegations of paragraph 99 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 99 of the Complaint.

100.

Any allegations of paragraph 100 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 100 of the Complaint.

101.

Any allegations of paragraph 101 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 101 of the Complaint.

102.

The allegations of paragraph 102 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 102 of the Complaint.

103.

The allegations of paragraph 103 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 103 of the Complaint.

104.

The allegations of paragraph 104 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 104 of the Complaint.

105.

The allegations of paragraph 105 are denied.

106.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 106 of the Complaint.

107.

C&S admits that it won a bid to supply Alum to the City of Rochester, Minnesota for the year 2006. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 108 of the Complaint.

108.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 108 of the Complaint.

109.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 109 of the Complaint.

110.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 110 of the Complaint.

111.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 111 of the Complaint.

112.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 112 of the Complaint.

113.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 113 of the Complaint.

114.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 114 of the Complaint.

115.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 115 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

116.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 116 of the Complaint.

117.

C&S denies any allegations of paragraph 117 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 117 of the Complaint.

118.

C&S denies any allegations of paragraph 118 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 118 of the Complaint.

119.

C&S denies any allegations of paragraph 119 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 119 of the Complaint.

120.

The allegations of paragraph 120 of the Complaint are denied.

121.

C&S admits that RGM sold Alum to DeKalb County during certain years prior to 2009. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 121 of the Complaint.

122.

C&S denies the allegations of paragraph 122 of the Complaint, except C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding another defendant's emails.

123.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 123 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.



124.

C&S denies any allegations of paragraph 124 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 124 of the Complaint.

125.

C&S denies any allegations of paragraph 125 which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 125 of the Complaint.

126.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 126 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

127.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 127 of the Complaint.

128.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 128 of the Complaint.

129.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 129 of the Complaint.

130.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 130 of the Complaint.

131.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 131 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

132.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 132 of the Complaint.

133.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 133 of the Complaint.

134.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 134 of the Complaint.

135.

The allegations of paragraph 135 of the Complaint are denied.

136.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 136 of the Complaint.

137.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 137 of the Complaint.

138.

C&S admits that it learned that General Chemical was purchasing “Alchem” and that C&S did not submit a bid for the contract to sell Alum to High Point, North Carolina in 2011. C&S denies the remaining allegations of paragraph 138 of the Complaint.

139.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 139 of the Complaint.

140.

The allegations of paragraph 140 which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 140 of the Complaint.

141.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 141 of the Complaint.

142.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 142 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

143.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 143 of the Complaint.

144.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 144 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

145.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 145 of the Complaint.

146.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 146 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

147.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 147 of the Complaint.

148.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 148 of the Complaint.

149.

The allegations of paragraph 149 of the Complaint are denied.

150.

C&S admits that in June, 2010 Mike Chandler was a Vice-President of C&S; a distributor asked C&S in an email to agree to supply alum at certain prices for numerous possible bids by the distributor, one of which was “Hickory”; and that Mike Chandler replied to the distributor’s request by stating, in part, “I am not wanting to do Hickory at this time and, if you could, double check that Alchem has Richmond Co. as it is historically a General account.” C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 150 of the Complaint.

151.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 151 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

152.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 152 of the Complaint.

153.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 153 of the Complaint.

154.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 154 of the Complaint.

155.

The allegations of paragraph 155 of the Complaint are denied.

156.

C&S admits that in or about June 2010, it was bidding aggressively for certain Alum accounts in or around Columbia, South Carolina. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 156 of the Complaint.

157.

C&S admits that Alex Avraamides has called Rob Chandler. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 157 of the Complaint.

158.

C&S admits that it bid lower than did General Chemical for one or more Alum accounts in or around Columbia, South Carolina on one or more occasions. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 158 of the Complaint.

159.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 159 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.

160.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 160 of the Complaint.

161.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 161 of the Complaint, except C&S denies that it had any involvement in any conspiracy as alleged.



162.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 162 of the Complaint and each sub-part thereof, except C&S denies that it had any involvement in any conspiracy, as alleged.

163.

The allegations of paragraph 163 of the Complaint that pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 163 of the Complaint.

164.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 164 of the Complaint.

165.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 165 of the Complaint.

166.

C&S denies the allegations of paragraph 166 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 166 of the Complaint.

167.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 167 of the Complaint.

168.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 168 of the Complaint.

169.

C&S denies that it submitted any bid for the sale of Alum which made no economic sense to C&S.

(a) C&S admits that in 2005, it submitted a bid to Grand Rapids, Michigan to sell Alum at the cost of \$232. C&S denies that its bid price made no economic sense to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of subparagraph (a) of paragraph 169 of the Complaint.

(b) C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of subparagraph (b) of paragraph 169 of the Complaint, except C&S denies that any bid it submitted made no economic sense to C&S.

(c) C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of subparagraph (c) of paragraph 169 of the Complaint.

(d) C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of subparagraph (d) of paragraph 169 of the Complaint, except C&S denies that any bid it submitted made no economic sense to C&S.

170.

C&S denies the allegations of paragraph 170 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 170 of the Complaint.

171.

C&S denies the allegations of paragraph 171 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 171 of the Complaint.

172.

C&S denies the allegations of paragraph 172 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 172 of the Complaint.

173.

C&S denies any allegations of paragraph 173 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 173 of the Complaint.

174.

C&S admits that Plaintiffs purport to bring this action as a class action, as alleged, but denies that the claims alleged satisfy the requirements for class certification or satisfy the elements of the various claims under the antitrust and/or consumer protection, unfair and deceptive trade practices statutes, and/or common law principals of unjust enrichment of the state set forth in paragraph 174. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 174 of the Complaint.

175.

The allegations of paragraph 175 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 175 of the Complaint.

176.

C&S denies the allegations of paragraph 176 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 176 of the Complaint.

177.

C&S denies the allegations of paragraph 177 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 177 of the Complaint.

178.

The allegations of paragraph 178 of the Complaint are denied.

179.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 179 of the Complaint.

180.

The allegations of paragraph 180 of the Complaint that pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 180 of the Complaint.

181.

The allegations of paragraph 181 of the Complaint that pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 181 of the Complaint.

182.

The allegations of paragraph 182 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 182 of the Complaint.

183.

C&S denies the allegations of paragraph 183 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 183 of the Complaint.

184.

C&S denies the allegations of paragraph 184 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 184 of the Complaint.

185.

C&S denies the allegations of paragraph 185 that pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 185 of the Complaint.

186.

The allegations of paragraph 186 of the Complaint which pertain to C&S are denied, and C&S denies that any statute of limitation should be tolled. C&S lacks

knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 186 of the Complaint.

187.

The allegations of paragraph 187 of the Complaint which pertain to C&S are denied, and C&S denies that any statute of limitation should be tolled. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 187 of the Complaint.

188.

The allegations of paragraph 188 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 188 of the Complaint.

189.

The allegations of paragraph 189 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 189 of the Complaint.

190.

The allegations of paragraph 190 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 190 of the Complaint.

**FIRST CLAIM FOR RELIEF**

191.

C&S incorporates by reference herein its responses to paragraphs 1-190 of its Answer, as if fully set forth herein. C&S denies the allegations of paragraph 191 of the Complaint which pertain to C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 191 of the Complaint.

192.

The allegations of paragraph 192 of the Complaint, and each sub-paragraph thereof, which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 192 of the Complaint.

193.

The allegations of paragraph 193 of the Complaint, and each sub-paragraph thereof, which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 193 of the Complaint.



194.

The allegations of paragraph 194 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 194 of the Complaint.

195.

The allegations of paragraph 195 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 195 of the Complaint.

196.

The allegations of paragraph 196 of the Complaint, and each sub-paragraph thereof, which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 196 of the Complaint.

## **SECOND CLAIM FOR RELIEF**

197.

C&S incorporates herein by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

198.

The allegations of paragraph 198 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 198 of the Complaint.

199.

C&S denies that there was a gross disparity between the price that any C&S customer paid for Alum and the value of Alum such customer received. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 199 of the Complaint.

200.

The allegations of paragraph 200 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 200 of the Complaint.

201.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 201 of the Complaint.

202.

The allegations of paragraph 202 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 202 of the Complaint.

203.

The allegations of paragraph 203 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 203 of the Complaint.

204.

The allegations of paragraph 204 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 204 of the Complaint.

205.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 205 of the Complaint.

206.

The allegations of paragraph 206 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 206 of the Complaint.

207.

The allegations of paragraph 207 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 207 of the Complaint.

208.

The allegations of paragraph 208 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 208 of the Complaint.

209.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 209 of the Complaint.

210.

The allegations of paragraph 210 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 210 of the Complaint.

211.

The allegations of paragraph 211 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 211 of the Complaint.

212.

The allegations of paragraph 212 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 212 of the Complaint.

213.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 213 of the Complaint.

214.

The allegations of paragraph 214 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 214 of the Complaint.

215.

The allegations of paragraph 215 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 215 of the Complaint.

216.

The allegations of paragraph 216 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 216 of the Complaint.

217.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 217 of the Complaint.

218.

The allegations of paragraph 218 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 218 of the Complaint.

219.

The allegations of paragraph 219 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 219 of the Complaint.

220.

The allegations of paragraph 220 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 220 of the Complaint.

221.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 221 of the Complaint.

222.

The allegations of paragraph 222 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 222 of the Complaint.

223.

The allegations of paragraph 223 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 223 of the Complaint.

224.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 224 of the Complaint.

225.

The allegations of paragraph 225 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 225 of the Complaint.

226.

The allegations of paragraph 226 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 226 of the Complaint.

227.

The allegations of paragraph 227 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 227 of the Complaint.

228.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 228 of the Complaint.



229.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 229 of the Complaint.

230.

The allegations of paragraph 230 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 230 of the Complaint.

231.

The allegations of paragraph 231 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 231 of the Complaint.

232.

The allegations of paragraph 232 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 232 of the Complaint.

233.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 233 of the Complaint.

234.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 234 of the Complaint.

235.

The allegations of paragraph 235 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 235 of the Complaint.

236.

The allegations of paragraph 236 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 236 of the Complaint.

237.

The allegations of paragraph 237 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 237 of the Complaint.

238.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 238 of the Complaint.

239.

The allegations of paragraph 239 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 239 of the Complaint.

240.

The allegations of paragraph 240 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 240 of the Complaint.

241.

The allegations of paragraph 241 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 241 of the Complaint.

242.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 242 of the Complaint.

243.

The allegations of paragraph 243 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 243 of the Complaint.

244.

The allegations of paragraph 244 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 244 of the Complaint.

245.

The allegations of paragraph 245 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 245 of the Complaint.

246.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 246 of the Complaint.

247.

The allegations of paragraph 247 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 247 of the Complaint.

248.

The allegations of paragraph 248 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 248 of the Complaint.

249.

The allegations of paragraph 249 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 249 of the Complaint.

250.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 250 of the Complaint.

251.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 251 of the Complaint.

252.

The allegations of paragraph 252 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 252 of the Complaint.

253.

The allegations of paragraph 253 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 253 of the Complaint.

254.

The allegations of paragraph 254 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 254 of the Complaint.

255.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 255 of the Complaint.

256.

The allegations of paragraph 256 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 256 of the Complaint.

257.

The allegations of paragraph 257 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 257 of the Complaint.

258.

The allegations of paragraph 258 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 258 of the Complaint.

259.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 259 of the Complaint.

260.

The allegations of paragraph 260 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 260 of the Complaint.

261.

The allegations of paragraph 261 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 261 of the Complaint.

262.

The allegations of paragraph 262 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 262 of the Complaint.

263.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 263 of the Complaint.

264.

The allegations of paragraph 264 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 264 of the Complaint.

265.

The allegations of paragraph 265 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 265 of the Complaint.

266.

The allegations of paragraph 266 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 266 of the Complaint.

### **THIRD CLAIM FOR RELIEF**

267.

C&S incorporates herein by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.



268.

C&S lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 268 of the Complaint, however, C&S denies that it is liable to Plaintiffs.

269.

The allegations of paragraph 269 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 269 of the Complaint.

270.

The allegations of paragraph 270 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 270 of the Complaint.

271.

C&S denies the allegations of paragraph 271 of the Complaint which pertain to C&S, and further denies that Plaintiffs are entitled to any remedy from C&S. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 271 of the Complaint.

272.

The allegations of paragraph 272 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 272 of the Complaint.

273.

The allegations of paragraph 273 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 273 of the Complaint.

274.

The allegations of paragraph 274 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 274 of the Complaint.

275.

The allegations of paragraph 275 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 275 of the Complaint.

276.

The allegations of paragraph 276 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 276 of the Complaint.

277.

The allegations of paragraph 277 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 277 of the Complaint.

278.

The allegations of paragraph 278 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 278 of the Complaint.

279.

The allegations of paragraph 279 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 279 of the Complaint.

280.

The allegations of paragraph 280 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 280 of the Complaint.

281.

The allegations of paragraph 281 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 281 of the Complaint.

282.

The allegations of paragraph 282 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 282 of the Complaint.

283.

The allegations of paragraph 283 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 283 of the Complaint.

284.

The allegations of paragraph 284 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 284 of the Complaint.

285.

The allegations of paragraph 285 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 285 of the Complaint.

286.

The allegations of paragraph 286 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 286 of the Complaint.

287.

The allegations of paragraph 287 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 287 of the Complaint.

288.

The allegations of paragraph 288 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 288 of the Complaint.

289.

The allegations of paragraph 289 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 289 of the Complaint.

290.

The allegations of paragraph 290 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 290 of the Complaint.

291.

The allegations of paragraph 291 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 291 of the Complaint.

292.

The allegations of paragraph 292 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 292 of the Complaint.

293.

The allegations of paragraph 293 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 293 of the Complaint.

294.

The allegations of paragraph 294 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 294 of the Complaint.

295.

The allegations of paragraph 295 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 295 of the Complaint.

296.

The allegations of paragraph 296 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 296 of the Complaint.

297.

The allegations of paragraph 297 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 297 of the Complaint.

298.

The allegations of paragraph 298 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 298 of the Complaint.

299.

The allegations of paragraph 299 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 299 of the Complaint.



300.

The allegations of paragraph 300 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 300 of the Complaint.

301.

The allegations of paragraph 301 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 301 of the Complaint.

302.

The allegations of paragraph 302 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 302 of the Complaint.

303.

The allegations of paragraph 303 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 303 of the Complaint.

304.

The allegations of paragraph 304 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 304 of the Complaint.

305.

The allegations of paragraph 305 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 305 of the Complaint.

306.

The allegations of paragraph 306 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 306 of the Complaint.

307.

The allegations of paragraph 307 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 307 of the Complaint.

308.

The allegations of paragraph 308 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 308 of the Complaint.

309.

The allegations of paragraph 309 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 309 of the Complaint.

310.

The allegations of paragraph 310 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 310 of the Complaint.

311.

The allegations of paragraph 311 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 311 of the Complaint.

312.

The allegations of paragraph 312 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 312 of the Complaint.

313.

The allegations of paragraph 313 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 313 of the Complaint.

314.

The allegations of paragraph 314 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 314 of the Complaint.

315.

The allegations of paragraph 315 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 315 of the Complaint.

316.

The allegations of paragraph 316 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 316 of the Complaint.

317.

The allegations of paragraph 317 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 317 of the Complaint.

318.

The allegations of paragraph 318 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 318 of the Complaint.

319.

The allegations of paragraph 319 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 319 of the Complaint.

320.

The allegations of paragraph 320 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 320 of the Complaint.

321.

The allegations of paragraph 321 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 321 of the Complaint.

322.

The allegations of paragraph 322 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 322 of the Complaint.

323.

The allegations of paragraph 323 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 323 of the Complaint.

324.

The allegations of paragraph 324 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 324 of the Complaint.

325.

The allegations of paragraph 325 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 325 of the Complaint.

326.

The allegations of paragraph 326 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 326 of the Complaint.

327.

The allegations of paragraph 327 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 327 of the Complaint.

328.

The allegations of paragraph 328 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 328 of the Complaint.

329.

The allegations of paragraph 329 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 329 of the Complaint.

330.

The allegations of paragraph 330 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 330 of the Complaint.

331.

The allegations of paragraph 331 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 331 of the Complaint.



332.

The allegations of paragraph 332 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 332 of the Complaint.

333.

The allegations of paragraph 333 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 333 of the Complaint.

334.

The allegations of paragraph 334 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 334 of the Complaint.

335.

The allegations of paragraph 335 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 335 of the Complaint.

336.

The allegations of paragraph 336 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 336 of the Complaint.

337.

The allegations of paragraph 337 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 337 of the Complaint.

338.

The allegations of paragraph 338 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 338 of the Complaint.

339.

The allegations of paragraph 339 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 339 of the Complaint.

340.

The allegations of paragraph 340 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 340 of the Complaint.

341.

The allegations of paragraph 341 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 341 of the Complaint.

342.

The allegations of paragraph 342 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 342 of the Complaint.

343.

The allegations of paragraph 343 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 343 of the Complaint.

344.

The allegations of paragraph 344 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 344 of the Complaint.

345.

The allegations of paragraph 345 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 345 of the Complaint.

346.

The allegations of paragraph 346 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 346 of the Complaint.

347.

The allegations of paragraph 347 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 347 of the Complaint.

348.

The allegations of paragraph 348 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 348 of the Complaint.

349.

The allegations of paragraph 349 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 349 of the Complaint.

350.

The allegations of paragraph 350 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 350 of the Complaint.

351.

The allegations of paragraph 351 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 351 of the Complaint.

352.

The allegations of paragraph 352 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 352 of the Complaint.

353.

The allegations of paragraph 353 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 353 of the Complaint.

354.

The allegations of paragraph 354 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 354 of the Complaint.

355.

The allegations of paragraph 355 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 355 of the Complaint.

356.

The allegations of paragraph 356 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 356 of the Complaint.

357.

The allegations of paragraph 357 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 357 of the Complaint.

358.

The allegations of paragraph 358 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 358 of the Complaint.

359.

The allegations of paragraph 359 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 359 of the Complaint.

360.

The allegations of paragraph 360 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 360 of the Complaint.

361.

The allegations of paragraph 361 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 361 of the Complaint.

362.

The allegations of paragraph 362 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 362 of the Complaint.

363.

The allegations of paragraph 363 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 363 of the Complaint.



364.

The allegations of paragraph 364 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 364 of the Complaint.

365.

The allegations of paragraph 365 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 365 of the Complaint.

366.

The allegations of paragraph 366 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 366 of the Complaint.

367.

The allegations of paragraph 367 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 367 of the Complaint.

368.

The allegations of paragraph 368 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 368 of the Complaint.

369.

The allegations of paragraph 369 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 369 of the Complaint.

370.

The allegations of paragraph 370 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 370 of the Complaint.

371.

The allegations of paragraph 371 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 371 of the Complaint.

372.

The allegations of paragraph 372 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 372 of the Complaint.

373.

The allegations of paragraph 373 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 373 of the Complaint.

374.

The allegations of paragraph 374 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 374 of the Complaint.

375.

The allegations of paragraph 375 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 375 of the Complaint.

376.

The allegations of paragraph 376 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 376 of the Complaint.

377.

The allegations of paragraph 377 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 377 of the Complaint.

378.

The allegations of paragraph 378 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 378 of the Complaint.

379.

The allegations of paragraph 379 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 379 of the Complaint.

380.

The allegations of paragraph 380 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 380 of the Complaint.

381.

The allegations of paragraph 381 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 381 of the Complaint.

382.

The allegations of paragraph 382 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 382 of the Complaint.

383.

The allegations of paragraph 383 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 383 of the Complaint.

384.

The allegations of paragraph 384 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 384 of the Complaint.

385.

The allegations of paragraph 385 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 385 of the Complaint.

386.

The allegations of paragraph 386 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 386 of the Complaint.

387.

The allegations of paragraph 387 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 387 of the Complaint.

388.

The allegations of paragraph 388 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 388 of the Complaint.

389.

The allegations of paragraph 389 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 389 of the Complaint.

390.

The allegations of paragraph 390 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 390 of the Complaint.

391.

The allegations of paragraph 391 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 391 of the Complaint.

392.

The allegations of paragraph 392 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 392 of the Complaint.

393.

The allegations of paragraph 393 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 393 of the Complaint.

394.

The allegations of paragraph 394 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 394 of the Complaint.

395.

The allegations of paragraph 395 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 395 of the Complaint.



396.

The allegations of paragraph 396 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 396 of the Complaint.

397.

The allegations of paragraph 397 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 397 of the Complaint.

398.

The allegations of paragraph 398 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 398 of the Complaint.

399.

The allegations of paragraph 399 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 399 of the Complaint.

400.

The allegations of paragraph 400 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 400 of the Complaint.

401.

The allegations of paragraph 401 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 401 of the Complaint.

402.

The allegations of paragraph 402 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 402 of the Complaint.

403.

The allegations of paragraph 403 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 403 of the Complaint.

404.

The allegations of paragraph 404 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 404 of the Complaint.

405.

The allegations of paragraph 405 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 405 of the Complaint.

406.

The allegations of paragraph 406 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 406 of the Complaint.

407.

The allegations of paragraph 407 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 407 of the Complaint.

408.

The allegations of paragraph 408 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 408 of the Complaint.

409.

The allegations of paragraph 409 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 409 of the Complaint.

410.

The allegations of paragraph 410 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 410 of the Complaint.

411.

The allegations of paragraph 411 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 411 of the Complaint.

412.

The allegations of paragraph 412 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 412 of the Complaint.

413.

The allegations of paragraph 413 of the Complaint which pertain to C&S are denied. C&S lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 413 of the Complaint.

Any allegation of the Complaint not otherwise responded to herein is hereby denied.

WHEREFORE C&S Chemicals, Inc. requests a trial by jury, that the Complaint against it be dismissed, and that it have any and all further relief which the Court deems just and appropriate.

Dated: August 28, 2017

Respectfully submitted,

/s/ John D. Dalbey

John D. Dalbey

Georgia Bar No. 003150

CHILIVIS, COCHRAN, LARKINS & BEVER LLP

3127 Maple Drive, NE

Atlanta, GA 30305

Telephone: (404) 233-4171

Facsimile: (404) 261-2842

*jddalbey@cclblaw.com*

*Counsel for Defendant C&S Chemicals, Inc.*

**CERTIFICATE OF SERVICE**

I, John D. Dalbey, hereby certify that on August 28, 2017, a true and correct copy of the ***DEFENDANT C&S CHEMICALS, INC.'S ANSWER AND AFFIRMATIVE DEFENSES TO INDIRECT PURCHASER PLAINTIFFS' CONSOLIDATED CLASS ACTION COMPLAINT*** was electronically filed with the Court using the Court's ECF system, which will send notification of such filing to all counsel of Record.

Respectfully submitted this 28th day of August, 2017.

s/ John D. Dalbey

John D. Dalbey

Georgia Bar No. 003150

CHILIVIS, COCHRAN, LARKINS & BEVER, LLP

3127 Maple Drive, NE

Atlanta, GA 30305

(404) 233-4171 (telephone)

(404) 261-2842 (facsimile)

jdd@cclblaw.com

*Counsel for Defendant C&S Chemicals, Inc.*